R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

IN THE DRAWINGS

The objection to the drawings has been obviated by appropriate amendment to the claims and should be withdrawn.

SUPPORT FOR CLAIM AMENDMENTS

Support for the amendments to the claims can be found in the drawings as originally filed, for example, on FIGS. 1 and 2 and in the specification as originally filed, for example, on page 9, line 4 through page 11, line 8 and page 14, lines 14-17. As such, no new matter has been added.

CLAIM REJECTIONS UNDER 35 U.S.C. §102

The rejection of claims 1-14, 16 and 20 under 35 U.S.C. §102(b) as being anticipated by Foster et al. '640 (hereinafter Foster) has been obviated by appropriate amendment and should be withdrawn.

Foster is directed to a method for producing titanium-containing thin films by low temperature plasma-enhanced chemical vapor deposition using a rotating susceptor reactor (Title).

In contrast, the presently pending invention (claim 1) provides a device comprising a one-piece outer portion comprising an electrically insulative material and having dimensions effective (i) to prevent or inhibit plasma arcing to an electrically conductive surface of a plasma processing chamber aperture and (ii) to fit securely into the plasma processing chamber aperture. The one-piece outer portion further comprises a flange section configured to remain outside of the plasma processing chamber aperture and an inner opening communicating through the electrically insulative material between a bottom and a top of the outer portion. The inner opening has dimensions effective to enable transmission of any of a physical signal, a gas, a gas mixture and other material through the device. Claims 5,6 and 8 provide similar recitations. Foster does not disclose or suggest each and every element of the presently claimed invention, arranged as in the claims. As such, the presently claimed invention is fully patentable over Foster and the rejection should be withdrawn.

Specifically, assuming, *arguendo*, the combination of items 270, 271 and 272 in FIG. 2B of Foster are similar to the presently claimed one-piece outer portion (as suggested on page 2, lines 7-20 of the Office Action and for which Applicants' representative does not necessarily agree), Foster does not disclose or suggest a one-piece outer portion as presently claimed. In particular, the items 270, 271 and 272 are (i) physically

separate from one another and (ii) appear to be made from different materials, as indicated by the use of different shadings (see FIG. 2B of Foster). Since the items 270, 271 and 272 are physically **separate** parts, Foster does not disclose or suggest a **one-piece** outer portion as presently claimed. Therefore, Foster does not disclose or suggest each and every element of the presently claimed invention, arranged as in the claims. As such, the presently claimed invention is fully patentable over Foster and the rejection should be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C. §103

The rejections of claim 17 under 35 U.S.C. §103(a) as being obvious over Foster and claims 15, 18 and 19 under 35 U.S.C. §103(a) as being obvious over Foster in view of Curtis '068 (hereinafter Curtis) have been obviated by appropriate amendment and should be withdrawn.

Claims 15, 17, 18 and 19 depend, either directly or indirectly, from claim 1 which is believed to be allowable. As such, the presently claimed invention is fully patentable over the cited references and the rejection should be withdrawn.

Furthermore, the conclusory statements in the Office Action (see page 7, lines 7-13 and page 8, lines 5-8 of the Office Action) fail to provide objective factual findings specifically identifying the principle or understanding that would have

motivated one of ordinary skill in the art with no knowledge of the presently claimed invention to make the invention. Therefore, the Office Action fails to meet the Office's burden of factually establishing a *prima facie* case of obviousness (see MPEP §§ 2142 and 2143.01). As such, the presently claimed invention is fully patentable over the cited references and the rejections should be withdrawn.

Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge our office Account No. 50-0541.

Respectfully submitted,

CHRISTOPHER P. MAIORANA, P.C.

Christopher P. Maiorana
Registration No. 42,829
24025 Greater Mack, Suite 200
St. Clair Shores, MI 48080
(586) 498-0670

Dated: September 26, 2002

Docket No.: 0325.00324

VERSION WITH MARKINGS TO SHOW CHANGES MADE

1. (THREE TIMES AMENDED) A device comprising:

[an] a one-piece outer portion comprising an electrically insulative material[,] and having [(i)] dimensions effective (i) to prevent or inhibit plasma arcing to an electrically conductive surface of a plasma processing chamber aperture and (ii) to fit securely into said plasma processing chamber aperture, said one-piece outer portion further comprising:

(i) a flange section configured to remain outside of said plasma processing chamber aperture; and

(ii) an inner opening[, completely surrounded by] communicating through the electrically insulative material between a bottom and a top of the outer portion, the inner opening having dimensions effective to enable transmission of any of a physical signal, a gas, a gas mixture [or] and other material through the device.

5. (THREE TIMES AMENDED) A plasma processing chamber having:

at least one aperture therein, the at least one aperture having an exposed electrically conductive surface, and

a [device] one-piece sleeve inside the aperture, the [device] one-piece sleeve comprising an electrically insulative material and having:

(i) dimensions effective to prevent or inhibit plasma arcing to the exposed electrically conductive surface of the aperture and to fit securely into the aperture; [, wherein]

(ii) a flange section [of said device is] configured to remain outside said aperture; and

[(ii)] (iii) an inner opening [completely surrounded by] communicating through the electrically insulative material from a bottom to a top of the one-piece sleeve, the inner opening having dimensions effective to enable transmission of any of a physical signal, a gas, a gas mixture [or] and other material through the device.

6. (THREE TIMES AMENDED) A method of making a plasma processing chamber, the chamber having at least one aperture therein, the at least one aperture having an exposed electrically conductive surface, the method comprising inserting a [device] one-piece sleeve into the aperture, the [device] one-piece sleeve comprising an electrically insulative material and having:

(i) dimensions effective to prevent or inhibit plasma arcing to the exposed electrically conductive surface of the aperture and to fit securely into said aperture; [, wherein]

(ii) a flange section [of said device is] configured to remain outside said aperture; and

(iii) an inner opening [completely surrounded by] communicating through the electrically insulative material between a bottom and a top of the one-piece sleeve, the inner opening having dimensions effective to enable transmission of any of a physical signal, a gas, a gas mixture [or] and other material through the [device] one-piece sleeve.

7. (AMENDED) The method of Claim 6, further comprising, prior to [said] inserting said one-piece sleeve, the step of forming said one-piece sleeve to match one or more dimensions of said aperture in said chamber.

8. (THREE TIMES AMENDED) A method of processing a workpiece, comprising:

(A) exposing the workpiece to a plasma in a chamber, the chamber having at least one aperture therein, the at least one aperture having

1) an exposed electrically conductive surface, [;] and

2) a [device] one-piece sleeve in the aperture, the [device] one-piece sleeve comprising an electrically insulative material and having

(i) dimensions effective to prevent or inhibit plasma arcing to the exposed electrically conductive surface of the aperture[, wherein] and to fit securely into said aperture,

(ii) a flange section [of said device is] configured to remain outside said aperture[;] and

[(ii)] (iii) an inner opening [completely surrounded by] communicating through the electrically insulative material between a bottom and a top of the one-piece sleeve, the inner opening having dimensions effective to enable transmission of any of a physical signal, a gas, a gas mixture [or] and other material through the device; and

(B) [(iii)] transmitting any of a physical signal, a gas, a gas mixture [or] and other material through the device [into] in to or out from the chamber.

11. (TWICE AMENDED) The method of Claim 9, further comprising, prior to step B, the steps of:

exposing a workpiece to the plasma, and

transmitting any of a physical signal, a gas, a gas mixture [or] and other material through the device into or out from the chamber.

12. (TWICE AMENDED) The device according to claim 1, wherein said one-piece outer portion further [comprising] comprises:

a lower section having a first width effective to fit the plasma processing chamber aperture within a predefined tolerance; and

said flange section [having] has a second width that is greater than a corresponding width of said plasma processing chamber aperture.

13. (TWICE AMENDED) The device according to claim 12, wherein said device is held in said plasma processing chamber aperture via a predetermined amount of pressure against a wall of said aperture [wire loop configured to hold said device under typical plasma processing conditions].

16. (AMENDED) The device according to claim 1, wherein an [end] outer surface of said device [has] forms an angle[, said angle measured] with reference to [a] the bottom of said device.